

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

'06 SEP 19 P 4 :03

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 06-CR-

06 CR 223

[Title 18, U.S.C. §§ 2 & 922(g)(1), and Title
21, U.S.C. §§ 841(a)(1), 841(b)(1)(A),
(b)(1)(C), 846, and 853]

TIMOTHY MILTON,
a.k.a. "Red," "Hobbs," and "H,"
TORRENCE MILTON,
a.k.a. "Loc" and "Tone Loc,"
TERRELL MILTON,
a.k.a. "Ramadon," "Don," "Renegade," "Ren," and "Gade,"
THEARTIS MILTON,
a.k.a. "Bo" and "Hurt,"
LASHONZA HUNT,
a.k.a. "Sandra,"
MARC MOSLEY,
a.k.a. "Crucial,"
DEMARIO MOSLEY,
a.k.a. "Ghost," "Spiff," and "Rio,"
ROY MONETTE,
a.k.a. "Blake,"
FELIC CLAYPOOL,
a.k.a. "Fig,"
BENJAMIN STIBBE,
TERI STIBBE, and
JONATHON SELENSKY,

Defendants.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

1. Beginning sometime in 2001 and continuing through September 13, 2006, in the State and Eastern District of Wisconsin and elsewhere,

TIMOTHY MILTON,
a.k.a. "Red," "Hobbs," and "H,"
TORRENCE MILTON,
a.k.a. "Loc" and "Tone Loc,"
TERRELL MILTON,
a.k.a. "Ramadon," "Don," "Renegade," "Ren," and "Gade,"
THEARTIS MILTON,
a.k.a. "Bo" and "Hurt,"
LASHONZA HUNT,
a.k.a. "Sandra,"
MARC MOSLEY,
a.k.a. "Crucial,"
DEMARIO MOSLEY,
a.k.a. "Ghost," "Spiff," and "Rio,"
ROY MONETTE,
a.k.a. "Blake," and
BENJAMIN STIBBE

defendants herein, knowingly and intentionally conspired with persons known and unknown to the grand jury to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

2. The offense involved 1 kilogram or more of a mixture and substance containing heroin, a Schedule I controlled substance, and 50 grams or more of a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance.

3. Death and serious bodily injury resulted from the use of the heroin distributed in furtherance of the conspiracy.

All in violation of Title 21, United States Code, Sections 841(b)(1)(A) & 846.

THE GRAND JURY FURTHER CHARGES:

COUNT TWO

1. That on or about October 16, 2005, in the State and Eastern District of Wisconsin,

**TERI STIBBE, and
ROY MONETTE,**
a.k.a. "Blake,"

defendants herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

2. Death resulted from the use of the heroin.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT THREE

1. That on or about November 29, 2005, in the State and Eastern District of Wisconsin,

TIMOTHY MILTON,
a.k.a. "Red," "Hobbs," and "H,"

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

2. Death resulted from the use of the heroin.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT FOUR

That on or about November 30, 2005, in the State and Eastern District of Wisconsin,

TIMOTHY MILTON,
a.k.a. "Red", "Hobbs" and "H",

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT FIVE

That on or about December 1, 2005, in the State and Eastern District of Wisconsin,

BENJAMIN STIBBE,

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT SIX

1. That on or about December 1, 2005, in the State and Eastern District of Wisconsin,

TIMOTHY MILTON,
a.k.a. "Red," "Hobbs," and "H,"

defendant herein, previously having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm which, prior to his possession of it, had been transported in interstate and foreign commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is described as a Glock 9mm semi-automatic pistol with serial number HFW127.

All in violation of Title 18, United States Code, Section 922(g)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT SEVEN

1. That on or about July 22, 2005, in the State and Eastern District of Wisconsin,

LASHONZA HUNT,
a.k.a. "Sandra,"

defendant herein, did provide a firearm to **TIMOTHY MILTON**, a.k.a. "Red," "Hobbs," and "H," knowing, or having reasonable cause to believe, **TIMOTHY MILTON** was a person who had previously been convicted of a crime punishable by imprisonment for a term exceeding one year.

2. The firearm is described as a Glock 9mm semi-automatic pistol with serial number HFW127.

All in violation of Title 18, United States Code, Sections 922(d)(1) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT EIGHT

That on or about February 28, 2006, in the State and Eastern District of Wisconsin,

JONATHON SELENSKY,

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT NINE

That on or about March 1, 2006, in the State and Eastern District of Wisconsin,

JONATHON SELENSKY,

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT TEN

That on or about March 3, 2006, in the State and Eastern District of Wisconsin,

JONATHON SELENSKY,

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT ELEVEN

1. That on or about March 7, 2006, in the State and Eastern District of Wisconsin,

TORRENCE MILTON,
a.k.a. "Loc," and "Tone Loc,"

defendant herein, knowingly and intentionally possessed with the intent to distribute a controlled substance.

2. The offense involved 50 grams or more of a mixture and substance containing cocaine base, in the form of crack cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

THE GRAND JURY FURTHER CHARGES:

COUNT TWELVE

That on or about April 19, 2006, in the State and Eastern District of Wisconsin,

TERRELL MILTON,

a.k.a. "Ramadon," "Don," "Renegade," "Ren," and "Gade,"

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT THIRTEEN

That on or about May 1, 2006, in the State and Eastern District of Wisconsin,

DEMARIO MOSLEY,
a.k.a. "Ghost," "Spiff," and "Rio,"

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT FOURTEEN

That on or about May 2, 2006, in the State and Eastern District of Wisconsin,

DEMARIO MOSLEY,
a.k.a. "Ghost," "Spiff," and "Rio,"

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT FIFTEEN

That on or about May 3, 2006, in the State and Eastern District of Wisconsin,

TERRELL MILTON,
a.k.a. "Ramadon," "Don," "Renegade," "Ren," and "Gade," and
DEMARIO MOSLEY,
a.k.a. "Ghost," "Spiff," and "Rio,"

defendants herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT SIXTEEN

That on or about May 10, 2006, in the State and Eastern District of Wisconsin,

DEMARIO MOSLEY,
a.k.a. "Ghost," "Spiff," and "Rio,"

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT SEVENTEEN

That on or about May 12, 2006, in the State and Eastern District of Wisconsin,

DEMARIO MOSLEY,
a.k.a. "Ghost," "Spiff," and "Rio,"

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT EIGHTEEN

That on or about May 17, 2006, in the State and Eastern District of Wisconsin,

DEMARIO MOSLEY,
a.k.a. "Ghost," "Spiff," and "Rio,"

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT NINETEEN

That on or about May 22, 2006, in the State and Eastern District of Wisconsin,

TERRELL MILTON,

a.k.a. "Ramadon," "Don," "Renegade," "Ren," and "Gade,"

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT TWENTY

That on or about May 25, 2006, in the State and Eastern District of Wisconsin,

TERRELL MILTON,

a.k.a. "Ramadon," "Don," "Renegade," "Ren," and "Gade,"

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT TWENTY-ONE

That on or about May 30, 2006, in the State and Eastern District of Wisconsin,

MARC MOSLEY,
a.k.a. "Crucial,"

defendant herein, did knowingly and intentionally distribute a mixture and substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(C), and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT TWENTY-TWO

1. Beginning in 2005 and continuing thereafter until April 2006, in the State and Eastern District of Wisconsin,

FELIC CLAYPOOL,
a.k.a. "Fig,"

defendant herein, managed and controlled a place as the permanent owner, lessee, and mortgagee, and made it available for use, with and without compensation, for the purpose of unlawfully manufacturing, storing and distributing heroin, a Schedule I controlled substance, and cocaine base in the form of crack cocaine, a Schedule II controlled substance.

2. The place was her residence located at 4419 N. 37th Street, Milwaukee, Wisconsin.

All in violation of Title 21, United States Code, Section 856(a)(2), and Title 18, United States Code, Section 2.

FORFEITURE NOTICE

All property of the defendants constituting or derived from any proceeds the defendants obtained as a result of the violations set forth in Count One, and all property of the defendants used or intended to be used to commit or facilitate the commission of the violations, is subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853. The properties subject to forfeiture include the following:

1. A personal money judgment against each defendant in the amount of \$1,000,000.00, an amount representing the unseized proceeds of the violations charged in Count One, and funds used to facilitate the violations; and

A TRUE BILL:



FOREPERSON

Dated: 9-19-06



Steven M. Biskupic
United States Attorney